

Findings and Recommendations

KEY FINDING #1

The scope of PCB hazards in schools in the United States is likely widespread, potentially affecting up to 30% of the school-aged population, but it is difficult to quantify the exposure from the variety of potential sources of PCBs. The cases of potential PCB hazards in schools provided by EPA reveal a variety of different sources of PCB contamination.

The Asbestos Hazard Emergency Response Act (AHERA) requires detailed record-keeping of asbestos hazards in schools. Records must be kept at each school and school authority, including details of inspection dates, plans for inspections, the locations of asbestos-containing building materials within a school, measures taken to reduce asbestos exposure, any analysis on materials in the school, and ways in which workers, teachers, students or their legal guardians have been notified about inspection and response activities.²³ No such recordkeeping or reporting related to PCB hazards in schools is required of schools, states or EPA. While the total number of schools that contain PCBs in decades-old building materials may exceed 25,000, there has been no effort to survey school systems or develop a comprehensive estimate of the scope of potential PCB hazards in schools.

A Harvard School of Public Health study²⁴ estimates that the number of schools with PCBs in caulk is between 12,960 and 25,920, and the average number of students per school is roughly 550 students, according to the National Center for Education Statistics²⁵. Consequently, between 7-14 million students across the United States, accounting for up to 30% of the elementary and secondary school population, may be exposed to PCBs through their school environment. This calculation relies upon an estimate of the number of schools built or renovated from 1950 and 1979, and the exact number is not known. In addition, it does not take into account schools with PCB-containing fluorescent light ballast or other PCB-containing materials, which could add to the numbers of potentially impacted schools and students.

The last federal government survey of school infrastructure was completed more than 20 years ago,²⁶ and the 2013 Report Card for America's Infrastructure by the American Society of Civil Engineers gives America's schools a grade of "D+." More than half of America's schools were built to educate the Baby Boomers generation, and substantial repairs and upgrades are needed to provide a modern and safe learning environment for all students.²⁷

According to materials Senator Markey's staff requested from EPA, there have been 286 cases of PCB hazards in schools in 20 states across thousands of school buildings in the past ten years (Table 1 on *page 11* and Attachment 1). Some cases involved single leaking fluorescent light ballast in a classroom, while the most significant were remediation projects for the largest school districts in the nation. The vast majority of the cases dealt with PCB-containing caulk. Additional PCB hazards identified in the records provided by EPA included soil, paint, adhesive, and window glazing.

Table 1. Summary of cases involving PCB hazards in schools provided by EPA

	Cases*	States
Region 1	186	5 (CT, MA, ME, NH, RI)
Region 2	15	2 (NY, NJ)
Region 3	7 ¹	2+DC (MD, WV, DC)
Region 4	1	1 (GA)
Region 5	4 ²	2 ² (IN, OH)
Region 6	1	1 (LA)
Region 7	2	2 (NE, MO)
Region 8	0	0
Region 9	2	1 (CA)
Region 10	69	4 (AK, ID, OR, WA)
TOTALS	286	20

* A case is defined as a PCB-involving incident as reported by the EPA, which ranges from a single classroom to a city-wide or school district-wide action! The John F. Kennedy Center was mistakenly added by the EPA to the list and is not counted in this total.

¹ One case was worked on by both Regions 5 and 10, so only 3 cases for Region 5 were geographically within Region 5.

RECOMMENDATION #1: The EPA should survey school systems nationwide and update its records to better assess the scope of potential PCB hazards in schools. The Asbestos Hazard Emergency Response Act (AHERA) should be amended to require recordkeeping by state and local educational agencies of testing for, response to, and remediation of PCB hazards in schools to be submitted to and approved by appropriate state officials, and should also require status reports from each state to the EPA both for asbestos and PCB hazards at least every ten years.

KEY FINDING #2

Because there is no federal requirement for the inspection of schools for PCB hazards in schools and in most cases no state-level requirements or even publicly-available guidance for testing or inspections for PCB hazards, schools often appear to learn of PCB hazards by chance, and it is therefore likely that additional cases of PCB hazards remain undetected.

There is no federal requirement for testing or inspection of schools for PCB hazards. Inspections for asbestos, by comparison, are required to be conducted by an accredited inspector under AHERA²⁸ at least every three years. Additionally, under AHERA, schools are also responsible for documenting exactly where asbestos is located within school buildings, while no such documentation is required for PCB-containing materials in schools.

The EPA provides guidance on “How to test for PCBs and characterize suspect materials,”²⁹ but states do not appear to require the use of these materials. A survey conducted by Senator Markey’s staff of the information publically available